

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: MARCUS A. LITTLE and SHANYEL LITTLE, AKA GIBSON-LITTLE, Debtors, SPECIALIZED LOAN SERVICING, LLC. AS SERVICING AGENT FOR TOWD POINT MORTGAGE TRUST ASSET-BACKED SECURITIES, SERIES 2019-SJ3, U.S. BANK NATIONAL ASSOCIATION, AS INDENTURE TRUSTEE, Movant, v. MARCUS A. LITTLE, SHANYEL LITTLE and WILLIAM C. MILLER, Trustee, Respondents.	Bankruptcy No. 20-11291-mdc Chapter 13 Document No. 31, 34
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STIPULATION RESOLVING MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, comes Movant, Specialized Loan Servicing, LLC, As Servicing Agent for Towd Point Mortgage Trust Asset-Backed Securities, Series 2019-SJ3, U.S. Bank National Association, as Indenture Trustee ("Movant"), by and through its undersigned counsel, Bernstein-Burkley, P.C., and, Debtors, Marcus A. Little and Shanyel Little, by and through herundersigned counsel, Brad J. Sadek, Esquire, and together file this Stipulation Resolving Motion for Relief from the Automatic Stay (the "Stipulation"), stating as follows:

1. The automatic stay as provided by Section 362 of the Bankruptcy Code shall remain in full force and effect conditioned upon the terms and conditions set forth herein.
2. Movant holds a Mortgage on the real property located at 3128 N. Spangler Street, Philadelphia, PA 19132 (the "Property").
3. As of the date of this Stipulation, the Debtors are in default of his post-petition payment obligations to Movant in the amount of \$1,510.96.

4. Debtors will cure the remaining post-petition arrears by making monthly payments to Movant in the amount of \$1,510.96 through an Amended Chapter 13 Plan to be filed by Debtors and their Counsel. In order to resolving the pending the Objection, the parties agree as follows:

- a. Debtors shall have an Amended Chapter 13 Plan to provide for the \$1,510.96 in post-petition arrears.
- b. The terms of this Stipulation shall be incorporated into the Debtors' confirmed Chapter 13 plan and any subsequent plan filed thereafter.
- c. Any conversion or dismissal of this case shall void the terms of the stipulated order.
- d. Beginning with the September 1, 2020 payment, the Debtor shall resume regular monthly payments directly to Movant.

5. Debtors shall direct the payments to:

Specialized Loan Servicing, LLC
P.O. Box 636007
Littleton, CO 80163

Payments must be received by Movant at the above-referenced address on or before the 1st day of each month. Debtors will be in default under the Stipulation in the event that Debtors fails to comply with the payment terms and conditions in Paragraph 4, *supra*. If Debtors default under this Stipulation, Movant may send Debtor and Debtor's counsel a Notice of Default. Debtor will have ten (10) days from the date of the Notice of Default to cure the default. If default is not cured after the ten days, a Certification of Default will be immediately filed with the Court by the Movant.

6. In the event the instant bankruptcy case is converted to a case under Chapter 7 of the Bankruptcy Code, the Debtors shall cure the pre-petition and post-petition arrears within ten (10) days from the date of such conversion. Should Debtors fail to cure said arrears within the ten day period, such failure shall be deemed a default under the terms of this Stipulation Movant may serve a notice of default and intent to file Certification of Default but Debtors will not be granted an opportunity to cure the default. Instead, a Certification of Default will be immediately filed with the Court.

7. This Stipulation may only be modified by a revised Stipulation filed on the docket in the Bankruptcy. No oral modifications are permitted and any allegation that the Stipulation was modified orally will be disregarded as evidence. No written modifications are permitted, except for a revised Stipulation filed on the docket in the Bankruptcy.

Agreed to by:

By: /s/ Keri P. Ebeck
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Bank National Association, as Indenture Trustee*

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Counsel for Anthony Parker

Dated: August 25, 2020